

Claims Administrator; (9) appointment of the Special Master; (10) appointment of the Escrow Agent; (11) approval of the Escrow Agreement; (12) establishment of the Qualified Settlement Fund; (13) scheduling of a Final Fairness Hearing; and (14) a stay of all proceedings brought by Releasing Persons in the MDL and in other Litigation in any forum as to Settling Defendants, and an injunction against the filing of any new such proceedings.

For the reasons set forth in the accompanying memorandum of law, the proposed Settlement is fair, reasonable, and adequate, and the proposed class should be preliminarily certified so that class notice may properly be disseminated.

Dated: July 10, 2023

Respectfully submitted,

/s/ Michael A. London

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Proposed Class Counsel

CERTIFICATE OF
SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 10th day of July, 2023 and was thus served electronically upon counsel of record.

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